

ZETLIN & DE CHIARA, LLP

Attorneys for Defendant

Polshek Partnership LLP

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Bill Chimos (BC-9381)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
HARTFORD FIRE INSURANCE COMPANY as
subrogor of Lycee Francais De New York,

07 Civ. 4084 (SHS) (AJP)

Plaintiff,

-against-

MAYRICH CONSTRUCTION CORP., LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES,
INC., F.J. SCIAME CONSTRUCTION CO., INC.,
POLSHEK PARTNERSHIP, LLP & CANTOR
SEINUK GROUP, INC.,

Defendants.
----- X

**DEFENDANT POLSHEK PARTNERSHIP LLP'S
RESPONSE TO MAYRICH CONSTRUCTION CORP. AND F.J. SCIAME
CONSTRUCTION CO., INC.'S NOTICE TO PRODUCE PURSUANT TO RULE 26**

Defendant Polshek Partnership LLP ("Polshek") by its attorneys Zetlin & De Chiara LLP, submits the following as and for its response to Defendants Mayrich Construction Corp. ("Mayrich") and F.J. Sciame Construction Co., Inc.'s ("Sciame") Notice to Produce Pursuant to Rule 26, dated July 26, 2007:

TO ALL PARTIES:

Mayrich and Sciame demands that all parties serve upon the undersigned, copies of any statement(s), written or otherwise recorded, of the party represented by the undersigned concerning the issues involved in this action; and that failure to produce said statement(s) will result in the parties being precluded from its use at the trial of this action.

RESPONSE:

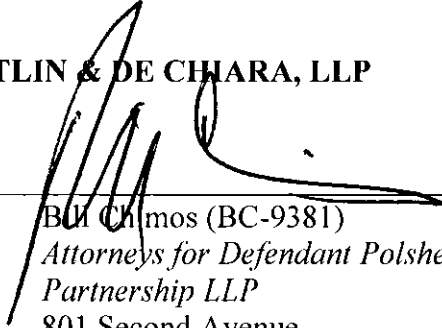
Polshek objects to this request as overly broad, unduly burdensome and not reasonably tailored to lead to the production of admissible evidence. Notwithstanding these objections, Polshek will produce all non-privileged and relevant documents within its possession, custody or control that are responsive to these demands for inspection and copying at a mutually convenient time, to the extent consistent with the requirements of the Federal Rules of Civil Procedure ("FRCP").

Polshek reserves the right to amend its disclosures pursuant to the requirements of the FRCP.

Dated: New York, New York
August 23, 2007

ZETLIN & DE CHIARA, LLP

By: _____


Bill Chimos (BC-9381)

*Attorneys for Defendant Polshek
Partnership LLP*

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TO: SEE SERVICE LIST